



PUBLIC RECORD – NON-CONFIDENTIAL

05th October 2021

Case number: 554/ADN2021/126
Product: Certain Concrete Underlay Film
From: Malaysia
Contact person: Ng Peg Shi
Email: pegshi@plastik-v.com
Role: Exporter

The Director – Investigations 4
Anti-Dumping Commission
GPO Box 2013
Canberra Act 2601

Dear Director,

RE : COMMENTS TO THE PRELIMINARY AFFIRMATIVE DETERMINATION FOR PLASTIK V SDN BHD

We have received the preliminary affirmative determination (PAD) report and would like to comment on the labour cost and SG&A. Please find our findings and comments as below for your consideration and review:-

1. Total labour cost as per trial balance includes subcontract labour (7000/303) and Foreign Worker (F/W) recruitment expenses (7000/305) which needs to be excluded as it is not part of DIRECT LABOUR COST. Further, this costs comes under recruitment costs **not related to the Goods Under Consideration** (GUC) but rather subcontract labour, where it is a purchase for products not related to the GUC and the subcontractor charged the company for their processing cost which includes profit margin, packaging and transport cost. For F/W recruitment expenses, it is a non-payroll expense [REDACTED] [Example of the F/W recruitment expenses] which is not part of direct labour cost.
2. For SG&A, below are some points that we consider should be excluded from the SG&A as **it is not related to the GUC**.
 - a) Brokerage – RM [REDACTED] [value & details]
 - b) Legal & Professional fees – RM [REDACTED] [value & details]
 - c) Collection – RM [REDACTED] [value & details]



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- d) Bills Discounting Interest – RM [REDACTED]
[REDACTED] [value & details]
- e) Bill Discounting Charges and Commission – RM [REDACTED]
[REDACTED] [value & details]
- f) LC charges & commission – RM [REDACTED]
[REDACTED] [value & details]
- g) BG charges & commission – RM [REDACTED] [value & details]
- h) Bills collection charges & commission – RM [REDACTED]
[REDACTED] [value & details]
- i) FC Trust receipt interest – RM [REDACTED]
[REDACTED] [value & details]
- j) FC Trust receipt charges – RM [REDACTED]
[REDACTED] [value & details]

Above are all the findings that we seek your consideration and hope you will review PAD again based on the above requests. Please feel free to contact me if you have any questions or clarifications.

Thank you!



Name : NG PEG SHI

Designation : GENERAL MANAGER